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9 Attorneys for Plaintiffs  
10 ESTHER KRENN and ESTATE OF  
11 LUIS ANDREW MARTINEZ By and  
12 Through his Administratrix, ESTHER KRENN.  
13



14 IN THE UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 ESTHER KRENN and ESTATE OF LUIS ) NO. CV 07-02295 JW PVT  
18 ANDREW MARTINEZ, By and Through his )  
19 Administratrix, ESTHER KRENN )  
20 Plaintiffs, )  
21 vs. )  
22 COUNTY OF SANTA CLARA; et. al., )  
23 Defendants. )  
24 \_\_\_\_\_ )  
25 )  
26 )  
27 )  
28 )

STIPULATION AND  
~~PROPOSED~~ ORDER TO  
ALLOW FILING OF THE  
PROPOSED SECOND  
AMENDED COMPLAINT AND  
ENLARGING RESPONSE TIME  
[FED. CIVIL L.R. 6-1(B), 6-2,  
AND/OR 7-12]

25 The parties, through their respective counsel of record, hereby stipulate and agree to the  
26 filing of Plaintiffs' Proposed Second Amended Complaint (attached hereto) as of today's date  
27 October 22, 2007, and to enlarge Defendants' time for filing their responsive pleading to November  
28

1 11, 2007. Presently the date for Defendants to file their responsive pleading to the First Amended  
 2 Complaint is October 19, 2007 pursuant to previous stipulation of the parties which enlarged  
 3 Defendants' time for filing their responsive pleadings. The parties now stipulate and agree to  
 4 relieve Defendants of the filing a responsive pleading to the First Amended Complaint and instead  
 5 allow for the filing of a Second Amended Complaint and to provide Defendants with 20 days in  
 6 which to respond.

7  
 8 The other administrative dates will remain fixed as ordered by the court, as follows:

9	Event	Current Date	Proposed Date
10	Complaint Filed	April 27, 2007	N/A
11	First Amended Complaint Filed	June 13, 2007	N/A
12	Pursuant to Stipulation Response Date	October 19, 2007	(Nov. 13, 2007 if Second 13 Amended Complaint is 14 ordered filed Oct. 18, 15 2007))
16	By Stipulation Second Amended Complaint to be Filed October 18, 2007		October 22, 2007
17	Pursuant to Proposed Nunc Pro Tunc Order of the Court		
18			
19	Stipulation Extending Time For Defendants To File Responsive Pleading Filed		November 13, 2007
20	Waivers / Proofs of Service Filed for FAC	August 27, 2007	N/A
21	Defendants' Declination To Proceed Before U.S. Magistrate Judge Filed	September 5, 2007	N/A
22			
23	Clerk's Notice of Impending Reassignment Issued	September 6, 2007	N/A
24			
25	Reassignment Order Issued	September 6, 2007	N/A
26	Response to Complaint Due	October 19, 2007	Nov. 13, 2007
27			
28	Last Date to Meet and Confer Regarding Initial Disclosures, Early	October 18, 2007	N/A

1 Settlement, ADR Process, and  
2 Discovery

3 Last Date to File Rule 26(f) Report, October 26, 2007 N/A  
4 Initial Disclosures, and Joint Case  
Management Conference Statement

5 Initial Case Management Conference November 19, 2007 N/A  
6 at 10:00 a.m.

7  
8 I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
9 "conformed" signature ( /S/ ) within this e-filed document.

10 IT IS SO STIPULATED.

11 Dated: October 18, 2007

12 THE LAW OFFICES OF GERI LYNN GREEN LC

13 By: \_\_\_\_\_ /S/  
14 GERI LYNN GREEN  
15 Attorney for Plaintiffs

16 DATED: October 22, 2007

17 ANN MILLER RAVEL  
18 County Counsel

19 By: \_\_\_\_\_ /S/  
20 GREGORY J. SEBASTINELLI  
21 Deputy County Counsel  
22 Attorneys for Defendants

23 PURSUANT TO STIPULATION, IT IS SO ORDERED as modified by the Court.

24  
25 Dated: October 26, 2007



26 Honorable James Ware  
27 United States District Court Judge

28 \\Greenlaw\serv\Geri Green\Geri's Documents\CLIENTS\krenn\krenn stip for sac FINAL 10-22.wpd